

**Floyd, Jonathan P.**

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**From:** Manning, Jason E.  
**Sent:** Tuesday, January 17, 2017 9:20 PM  
**To:** Ahmad Keshavarz  
**Cc:** Jessica Moody; Floyd, Jonathan P.  
**Subject:** Re: Young v. PRA - depositions and mediation

Ahmad, you continue to exclude Jonathan from communications despite our repeated requests. please extend us this common courtesy. thank you

On Jan 17, 2017, at 7:51 PM, Ahmad Keshavarz <[ahmad@newyorkconsumerattorney.com](mailto:ahmad@newyorkconsumerattorney.com)> wrote:

Jason,

We can confirm the 27<sup>th</sup> for the mediation. You had previously indicated that you wanted my client's deposition prior to mediation, then made clear you do not want my client's deposition prior to mediation, and now you say you want my client's deposition. What is going on?

I would be glad to discuss the possibility of my client's deposition – in fact I have been asking repeatedly for dates to take her deposition and have been ignored. As I have stated on a number of cases, my client's testimony is the best basis for the valuation of her case's valuation.

However, the court ordered PRA to produce the documents and information previously agreed to, and that court order has been entirely ignored. Part of the reason for compelling those items was for me to decide what additional depositions to be able to take. I am concerned that the delay in complying with the order is not a reason to allow my taking of additional depositions – which is one of the reasons you had agreed months ago to provide that information.

PRA has also not produced all the recordings, which is incredible.

When you comply with the prior two paragraphs I would be glad to discuss the date of my client's deposition– which I have long wanted you to take.

Fully and substantively comply, this week and we should be able to set her deposition next week.

Thanks.

**The Law Office of Ahmad Keshavarz**

16 Court St., 26<sup>th</sup> Floor, Brooklyn, NY 11241-1026

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**From:** Floyd, Jonathan P. [<mailto:Jonathan.Floyd@troutmansanders.com>]

**Sent:** Tuesday, January 17, 2017 6:38 PM

**To:** Ahmad Keshavarz

**Cc:** Jessica Moody; Manning, Jason E.; Genovese, Amanda Lyn

**Subject:** RE: PRA ads. Young

Mr. Keshavarz,

Please confirm the below dates so that we can make arrangements for the mediation and depositions.

Thank you kindly,

JPF

**Jonathan P. Floyd**  
TROUTMAN SANDERS LLP  
804.697.1435 (direct) | 804.697.1339 (fax)

**From:** Floyd, Jonathan P.  
**Sent:** Thursday, January 12, 2017 6:10 PM  
**To:** [ahmad@newyorkconsumerattorney.com](mailto:ahmad@newyorkconsumerattorney.com)  
**Cc:** Jessica Moody; Manning, Jason E.; Genovese, Amanda Lyn  
**Subject:** PRA ads. Young

Mr. Keshavarz,

We would like to depose Plaintiff and her son on January 26, 2017 and conduct mediation with Mr. Baum the following day (January 27, 2017).

Please let us know if you are available. Also, please include me in all communications concerning this matter, including those with the Court.

Thank you kindly,

JPF

**Jonathan P. Floyd**  
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